

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: **James W. Tipton III**

Debtor

JPMorgan Chase Bank, N.A.

Movant

vs.

James W. Tipton III

Debtor

Charles J. DeHart, III Esq.,

(Trustee)

BK NO. 16-02432 MDF

Chapter 13

Pleading: Motion for Relief from Stay

REQUEST TO REMOVE FROM THE HEARING/TRIAL LIST

CHECK ONE:

☐ The undersigned hereby withdraws the above-identified pleading with the consent of the opposition, if any.

☒ The undersigned counsel certifies as follows:

- (1) A settlement has been reached which will be reduced to writing, executed and filed within forty-five (45) days.
- (2) If a stipulation is not filed or a hearing requested within forty-five (45) days, it is understood that this proceeding will be dismissed without prejudice.
- (3) Contemporaneous with the filing for this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: December 16, 2016

/s/Thomas I. Puleo, Esquire

Thomas I. Puleo, Esquire

Attorney for Movant

KML Law Group, P.C.